

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION, et al.

Defendants.

Civil Action No. 06-726-JJF

**PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS
AND SANCTIONS PURSUANT TO 28 U.S.C. § 1927**

Plaintiff LG.Philips LCD Co., Ltd. ("LPL") respectfully moves this Court for Rule 11 sanctions against Defendant Chi Mei Optoelectronics Corporation ("CMO") and its attorneys. On December 1, 2006, Plaintiff LG.Philips LCD Co., Ltd. ("LPL") filed a Complaint for Patent Infringement against CMO and others alleging infringement of three of LPL's United States patents. On April 6, 2007, CMO filed a Motion to Dismiss for Lack of Personal Jurisdiction and Insufficiency of Service of Process (D.I. 19). After repeated attempts to encourage CMO to withdraw its baseless motion, LPL was forced to respond to CMO's motion, and on May 22, 2007, LPL filed its opposition brief (D.I. 57.) LPL now seeks sanctions against CMO and its attorneys for the filing by CMO of its frivolous motion to dismiss.

The factual and legal support for this motion are set forth in the accompanying brief, the Declaration of Gaspare J. Bono and the exhibits attached thereto, which have been simultaneously served with this motion.

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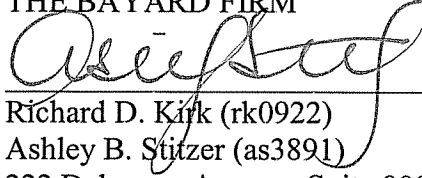
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**LOCAL RULE 7.1.1 STATEMENT IN SUPPORT OF PLAINTIFF'S MOTION
FOR RULE 11 SANCTIONS AND SANCTIONS PURSUANT TO 28 U.S.C. §1927**

The undersigned attorney for plaintiff, LG. Philips LCD Co., LTD ("LPL"), hereby states, pursuant to Local Rule 7.1.1, that LPL's attorneys have made a reasonable effort to reach agreement with opposing counsel on the matters set forth in the Motion for Rule 11 Sanctions and Sanctions Pursuant to 28 U.S.C. §1927 (the "Motion"), as set forth in the accompanying Opening Brief in support of the Motion, but that agreement was not forthcoming.

June 19, 2007

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CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on June 19, 2007, she served the foregoing documents by email and by hand upon the following counsel:

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